



State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

Michael O. Leavitt
Governor

Kathleen Clarke
Executive Director

Lowell P. Braxton
Division Director

1594 West North Temple, Suite 1210

PO Box 145801

Salt Lake City, Utah 84114-5801

801-538-5340

801-359-3940 (Fax)

801-538-7223 (TDD)

March 13, 2000

Gary Gray, Resident Agent
Genwal Resources, Inc.
P.O. Box 1420
Huntington, Utah 84528

Re: Division Order -DO99A, Genwal Resources, Inc., Crandall Canyon Mine, ACT/015/032-
DO99A, Outgoing File

Dear Mr. Gray:

The Division has found your response (February 24, 2000) to the Division Order (DO), DO99A, to be deficient. The DO of November 23, 1999, requires the update of the Water Monitoring Plan, to be submitted. The plan required changes outlined in the enclosed technical analysis. As a result your plans are considered deficient and they must be revised.

Please review them carefully and prepare a response which will address the findings of deficiency. We will expect your revised plans by May 8, 2000. Thank you for your help in completing these requirements. Please call if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Daron R. Haddock".

Daron Haddock,
Permit Supervisor

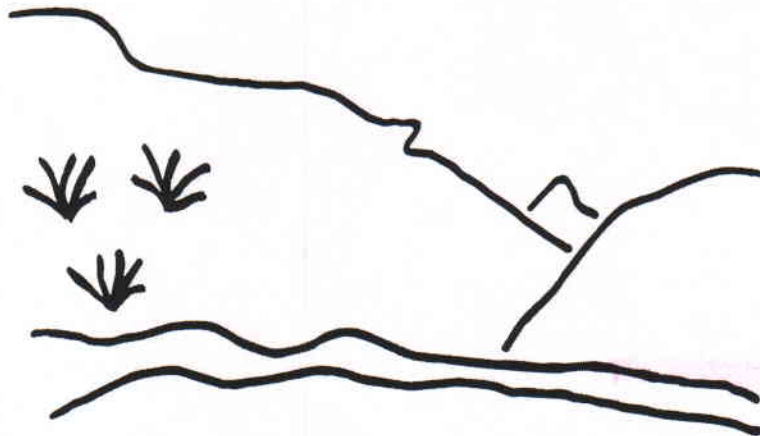
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Enclosure

cc: Price Field Office

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State of Utah



Utah Oil Gas and Mining

Coal Regulatory Program

Crandall Canyon
Division Order
ACT/015/032-DO99A
Technical Analysis
March 13, 2000

INTRODUCTION

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A Division Order (DO) was sent to Genwal Resources, Inc. on November 23, 1999. The DO was issued after it was found that the MRP did not contain a clear and concise description of the of the water monitoring plan. The applicant is required to show all water monitoring locations, monitoring frequency and special parameters associated with each sample location. The applicant should ensure that a operational and reclamational maps are provided in the MRP, which show water monitoring locations.

The operator submitted a response to the DO on January 24, 2000. The information submit by the operator is not complete at this time. There is an inadvertent error in locating the monitoring locations on Plate 7-18. Monitoring site

OPERATION PLAN

HYDROLOGIC INFORMATION

Regulatory Reference: R645-301-742, -301-761.

Analysis:

The operator supplied an update of water quality monitoring schedules in Table 7-10. The table identifies all water monitoring station, their locations, and refers the parameters to be monitored in Tables 7-4 or 7-8 and UPDES requirements. There is an error on Plate 7-18. Spring SP1-9 was not identified on the map (Plate 7-8), which needs to be corrected.

During the review, it was discovered that Tables 7-4, 7-5, 7-8 and 7-9 lack some of the parameter definition recommended in the Water Monitoring Guidelines(July 1, 1997). I mentioned this situation to Gary Gray in a telephone conversation on March 8, 2000. I asked if he could pattern the above mentioned tables after the water monitoring guidelines, which will ensure concise reporting of constituents and ensure better data reporting. Gary requested a copy of the Water Monitoring Guidelines, which he said would be used to modify the tables. I stated that I would transmit the guidelines to him via telephone facsimile on March 8, 2000.

Findings:

The information submitted to address Division Order DO99A remains incomplete at this time. The operator needs to identify the water monitoring location SP1-9 on Plate 7-18. To make the Crandall Canyon Mine's Water Monitoring Plan concise (Tables 7-4, 7-5, 7-8 and 7-9), the operator should identify the type of analysis that will be conducted on constituents in the water samples, as referenced in the Water Monitoring Guidelines (copy enclosed).